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Taylor J. Crabill
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March 22, 2024

VIA ECF

The Honorable Jennifer E. Willis
 United States District Court
 Southern District of New York
 40 Foley Square, Courtroom 905
 New York, New York, 10007

Re: Lipstein v. 20X Hospitality LLC, et al., Case No. 22-cv-04812-DEH-JEW

Dear Judge Willis:

We represent Plaintiff and write with Defendants' consent to respectfully request an extension of the following deadlines:

	Original Deadlines	Proposed New Deadlines
Depositions	March 22, 2024	September 27, 2024
Fact Discovery	March 22, 2024	September 27, 2024
Expert Discovery	May 10, 2024	November 15, 2024

The above-referenced extensions are requested because the parties need additional time to complete fact and expert discovery related to Plaintiff's individual claims as well as discovery related to any opt-in plaintiffs of the putative collective in connection with claims under the Fair Labor Standards Act, 29 U.S.C. §§ 201, *et seq.* On March 19, 2024, the Honorable Dale E. Ho approved and adopted Your Honor's Report and Recommendation that Plaintiff's renewed request for conditional certification under the FLSA be granted. *See* ECF No. 87. Plaintiff anticipates that notice will be sent to the putative members of the collective by the end of the month and that the notice period for potential opt-in plaintiffs to join this action will be completed by the end of May 2024. As such, the requested extensions will allow the parties sufficient time to complete discovery following the close of the notice period. This is Plaintiff's first request for an extension of the above-referenced deadlines.

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We thank the Court for its time and attention to this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Taylor J. Crabill'.

Cc: Counsel of Record (*via* ECF)

Taylor J. Crabill